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8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 CARLOS HASAKIAN,

12 Plaintiff,

13 vs.

14 KILILO KIJAKAZI,
Acting Commissioner of Social Security,

15 Defendant.
16

)
) Case No.: 2:22-cv-01630-VCF
)

) **UNOPPOSED MOTION FOR EXTENSION OF**
) **TIME TO FILE DEFENDANT'S CROSS-**
) **MOTION TO AFFIRM AND RESPONSE TO**
) **PLAINTIFF'S MOTION FOR REVERSAL**

) ***(FIRST REQUEST)***
)
)

1 Defendant, Kilolo Kijakazi, Acting Commissioner of Social Security (the "Commissioner"), by
2 and through her undersigned attorneys, hereby moves for a 25-day extension of time to file Defendant's
3 Cross-Motion to Affirm and Response to Plaintiff's Motion for Reversal. The current deadline is January
4 30, 2023. This is the Commissioner's first request for an extension of time.

5 Defendant submits that good cause exists for this extension request. Defendant's counsel was
6 unexpectedly out of the office due to a family medical emergency. Additionally, Defendant requires
7 additional time to confer with her client regarding the issues raised in this case. Defendant respectfully
8 requests a 25 day extension.

9 On January 30, 2023, the undersigned conferred with Plaintiff's counsel, who has no opposition to
10 the requested extension.

11 It is therefore respectfully requested that Defendant be granted an extension of time to file Cross-
12 Motion to Affirm and Response to Plaintiff's Motion for Reversal, through and including Friday, February
13 24, 2023.

14 Dated: January 30, 2023

JASON M. FRIERSON
United States Attorney

16 /s/ Andrea Banks
17 ANDREA BANKS
18 Special Assistant United States Attorney
Attorneys for Defendant

19
20 IT IS SO ORDERED:

21 
22 _____
UNITED STATES MAGISTRATE JUDGE

23 DATED: 2-6-2023
24 _____
25
26

CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 160 Spear Street, Suite 800, San Francisco, California 94105. I am not a party to the above-entitled action. On the date set forth below, I caused service of **UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE DEFENDANT'S CROSS-MOTION TO AFFIRM AND RESPONSE TO PLAINTIFF'S MOTION FOR REVERSAL** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

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Attorneys for Plaintiff

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 30, 2023

/s/ Andrea Banks
ANDREA BANKS
Special Assistant United States Attorney